

Exhibit 1

From: Ken Kim
Sent: Wednesday, August 26, 2020 11:35 AM
To: Barbara Bibas; Acacia Dietz
Cc: ESQ Edward ReBrook; iDS_SINKS-02678
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Please disregard the below email. Per the Court Order requiring that NSM discovery be produced directly to Plaintiffs without an opportunity for review by counsel, iDS will proceed with getting the below 2,141 documents promoted and produced to Plaintiffs.

Please let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Barbara Bibas <bbibas@idsinc.com>
Sent: Monday, August 24, 2020 8:39 PM
To: Acacia Dietz <acacia.dietz@outlook.com>; Ken Kim <kkim@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

Hi Acacia,

We were able to work with Mr. Colucci on the 2FA call to get the data downloaded for 23 NSM email accounts. We've run the search terms across this data set and have attached the STR above for your review. Below is a summary:

Documents in Searchable Set	Total Documents with Hits	Total Documents with Hits, including Family	Total Documents without Hits
3,839	1,881	2,141	1,698

Please let us know if we may promote the 2,141 documents to the review workspace.

Thank you,

Barbara

Barbara Bibas

Discovery Services Consultant

iDiscovery Solutions

535 Anton Blvd., Suite 860

Costa Mesa, CA 92626

Mobile: 949.929.1518

From: Acacia Dietz <acacia.dietz@outlook.com>

Sent: Tuesday, August 18, 2020 1:10 PM

To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>

Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; IDS_SINKS-02678 <ids_sinks-02678@idsinc.com>

Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

Just checking in to see if there was any update as far as the forensics investigation on Mr. Colucci's devices? And or the NSM email accounts. Thank you.

ACACIA DIETZ

Legal Assistant

THE REBROOK LAW OFFICE

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)

Sent: Monday, August 10, 2020 2:01 PM

To: [Acacia Dietz](#); [Barbara Bibas](#)

Cc: [ESQ Edward ReBrook](#); [IDS_SINKS-02678](#)

Subject: RE: Re: Sines v. Kessler

Hi Acacia:

We are still running the forensics investigation on Mr. Colucci's devices (laptop and iPhone). We are hoping to get this completed later this week – we will keep you posted.

We are currently on call with Mr. Colucci to address the password resets/2FA for the various NSM accounts.

Regards,

Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Monday, August 10, 2020 1:56 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

I was just checking in on the status of Mr. Colucci's / NSM discovery? I was checking to see if the forensic investigation had been completed on Mr. Colucci's devices (laptop and iPhone) and to also see if your forensics team was able to make arrangements with Mr. Colucci with any success? I did see the email from Bobby regarding the Zoom invite for Mr. Colucci to go over the 2FA accounts etc. Are you aware if Mr. Colucci responded?

Thank you.

Best Regards,

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Tuesday, August 4, 2020 10:20 PM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS_SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Unfortunately, our forensics team initiates telephone calls for purposes of addressing 2FA once they have a set date/time scheduled for the call in advance. If you are able to get in contact with Mr. Colucci would you please have him respond to my initial email to set up a date/time to get on a call with our forensics team?

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Tuesday, August 4, 2020 9:37 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

Thank you. I did see the email was sent out and was checking to see if he had responded to it. I will check with him again. May be easier to contact him by phone, as I am unsure how often Mr. Colucci checks his email.

Best Regards,

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Tuesday, August 4, 2020 7:30 PM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS_SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Thank you and let us know.

Also, Mr. Colucci has not yet replied to my email sent last week inquiring about availability to connect with our forensics team to address the password reset/2FA of the email accounts you specified – both you and Mr. ReBrook were copied on the email.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Tuesday, August 4, 2020 6:52 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken,
Thank you. I will check with Mr. Colucci about the passwords for those accounts. I appreciate you getting back with me concerning this.

Also, were you able to make arrangements with Mr. Colucci concerning the email accounts?

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Tuesday, August 4, 2020 12:12 PM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [IDS_SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Based on our notes, it looks like we made our first attempts to log into the specified 4 accounts on or around 7/10/2020, albeit without success.

Let us know if you have any other questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Ken Kim
Sent: Monday, August 3, 2020 3:03 PM
To: Acacia Dietz <acacia.dietz@outlook.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; IDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

- 1) Thanks for confirming that we should be performing the forensics investigation on both Mr. Colucci's laptop and iPhone 11 Pro Max. We can start performing the forensics investigation using the forensic images we already have of the 2 devices, but we will let you know if we do need to have the devices sent back to IDS.
- 2) We will provide/confirm the requested date(s) to you shortly.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
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Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Monday, August 3, 2020 2:47 PM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

1.) Mr. Colucci gives his consent for the forensics investigation to be done on both the laptop and the iPhone 11 Pro Max. What are the next steps regarding Mr. Colucci's 2 devices? Is this able to be done with the information already gathered or would Mr. Colucci need to send those devices back to iDS?

2.) Are you able to find out what date data was attempted to be collected for the Blogtalk: 516-453-6058, Emails: chiefstaff@nsm88.org, commanderburt@nsm88.org, and Benchmark? I am asking because according to the Order from 6/23/2020, it stated that the data collected from those accts was to be collected and produced to the Plaintiffs on or before July 10, 2020. Are you able to confirm if collection on those accts was started before 7/10/2020?

Thank you.
Best Regards,
ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Monday, August 3, 2020 9:08 AM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS_SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

- 1) Our forensics investigation involves gathering full inventory of items on the devices as well as full investigation into any deleted items. Please confirm that you want us to proceed with this forensics investigation and we will proceed accordingly. Also, do you want us to run the forensics investigation on both the laptop and the iPhone 11 Pro Max, or just one of the 2 devices?
- 2) The "Date Device/Account Made Available" usually records the date on which iDS was first provided account/device information from defendants' certificates. This is regardless of whether iDS encountered any subsequent issues with the collection, i.e., incorrect credentials, closed accounts, etc. We were provided with NSM's certificate from Mr. Colucci on July 7, 2020 (as reflected in the status report). The actual date iDS received the 2 devices (laptop and iPhone 11 Pro Max) was on July 20, 2020.
- 3) Going forward, we will make sure to include you in the release emails when we sent out updated status reports.

Let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Monday, August 3, 2020 4:14 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

Thank you for clarifying. The Plaintiffs are requesting to do a forensic investigation of Mr. Colucci's devices to which you already collected ESI, is this something that iDS is able to do?

Also, according to the status report it shows when the device/acct became available for iDS to collect data - is this an account of when collection was attempted and/or completed for Mr. Colucci's accounts/devices, if not, would you be able to give me an account of when collection was attempted/completed? Primarily for the ones that Mr. Colucci gave to you on his certification form dated 6/29/20.

A0054	National Socialist Movement	Bitchute	nsm88me
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	
TBD	National Socialist Movement	Email	chief
TBD	National Socialist Movement	Email	comr
TBD	National Socialist Movement	Email	comma
TBD	National Socialist Movement	Email	Minne
TBD	National Socialist Movement	Email	nsm88a
TBD	National Socialist Movement	Email	nsm88b
TBD	National Socialist Movement	Email	nsm88c
TBD	National Socialist Movement	Email	nsm88d
TBD	National Socialist Movement	Email	nsm88e
TBD	National Socialist Movement	Email	nsm88f
TBD	National Socialist Movement	Email	nsm88g
TBD	National Socialist Movement	Email	nsm88h
TBD	National Socialist Movement	Email	nsm88i
TBD	National Socialist Movement	Email	nsm88j

TBD	National Socialist Movement	Email	nsm88m
TBD	National Socialist Movement	Email	nsm88
TBD	National Socialist Movement	Email	nsm88
TBD	National Socialist Movement	Email	nsm88sc
TBD	National Socialist Movement	Email	nsm88t
TBD	National Socialist Movement	Email	nsm88
TBD	National Socialist Movement	Email	nsm88
TBD	National Socialist Movement	Email	nsm88w
TBD	National Socialist Movement	Email	nsmalab
TBD	National Socialist Movement	Email	nsmam
TBD	National Socialist Movement	Email	nsmark
TBD	National Socialist Movement	Email	nsmchi
TBD	National Socialist Movement	Email	nsmcolu
TBD	National Socialist Movement	Email	nsmflo
TBD	National Socialist Movement	Email	nsmfre
TBD	National Socialist Movement	Email	nsmma
TBD	National Socialist Movement	Email	nsmms
TBD	National Socialist Movement	Email	nsmnc
TBD	National Socialist Movement	Email	nsmorla
TBD	National Socialist Movement	Email	nsmpe

TBD	National Socialist Movement	Email	nsmre
TBD	National Socialist Movement	Email	nsmre
TBD	National Socialist Movement	Email	nsmreg
TBD	National Socialist Movement	Email	nsmss
TBD	National Socialist Movement	Email	nsmver
TBD	National Socialist Movement	Email	nsmwes
TBD	National Socialist Movement	Email	r3nsm
TBD	National Socialist Movement	Facebook	
TBD	National Socialist Movement	Hotline Service	
A0105	National Socialist Movement	Laptop	Aspi
A0104	National Socialist Movement	Mobile Device	iP
TBD	National Socialist Movement	Mobile Device	
TBD	National Socialist Movement	Newsletter Service	
TBD	National Socialist Movement	Newsletter Service	C
TBD	National Socialist Movement	Twitter	
TBD	National Socialist Movement	Twitter	

TBD	National Socialist Movement	Vkontakte (VK)	
TBD	National Socialist Movement	Vkontakte (VK)	
TBD	National Socialist Movement	Website	v
TBD	National Socialist Movement	Yahoo Groups Newsletter Service	nsmwor
TBD	National Socialist Movement	YouTube	

Mr. ReBrook has asked that my email address acacia.dietz@outlook.com be added to the Status Report update email list so that we can make sure these reports are received and filed properly. Would this be possible?

Thank you,

ACACIA DIETZ
 Legal Assistant
THE REBROOK LAW OFFICE
 Phone: 586.696.0385
 Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Friday, July 31, 2020 7:41 AM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

The comment "No reviewable documents available from collected data" provided in the 7/17 status report for Mr. Colucci's iPhone 11 Pro Max reflects that although there were text messages available and collected from the device (~100 messages) as reflected by the "Collection Completed" comment under the "Collection Status" column of the same status report, none of these messages contained any

actual text in the body. And without any actual text in the body of the messages there is no content for iDS to run search terms for promotion and subsequent review/production. I hope this helps to clarify things.

Also, the last status report that was provided to all parties is the 7/17 status report (the same one that you received from Mr. Barkai) – there has not been an updated one sent out since. Additionally, Mr. ReBrook has been included in all email release of the status reports that are sent to all parties. Please let us know if you have not been receiving these emails.

Let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, July 31, 2020 1:10 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

I am writing in regards to a status update regarding the NSM ESI and Mr. Colucci's devices. The latest update that was received was from July 17, 2020. In regards to Mr. Colucci's iPhone 11 Pro Max, it was stated that: "No reviewable documents available from collected data". Can you clarify what this means please?

A0104	National Socialist Movement	Mobile Device	Colucci iPhone 11 Pro Max	7/7/2020	Collection Completed	No reviewable documents available from collected data.
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We received an email on Thursday July 30, 2020 from Plaintiffs counsel (Mr. Barkai) stating that:

“We understand that approximately 100 chat or message items were retrieved from the iPhone 11 Pro Max but that they had no actual text in the message body”
“the iPhone contained 100 blank messages”

Are you able to clarify this a bit, because according to the latest discovery status report, which we received from Mr. Barkai, it said that there were no reviewable documents and doesn't show that there were any documents or collected data from Mr. Colucci's cell phone. Is there an updated discovery status report or is there something that we missed?

Can you send us a copy of the most recent status report please also. Thank you.

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Monday, July 20, 2020 11:55 AM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [IDS SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Confirming that Mr. Colucci's devices were shipped out on Friday and delivered this morning. The tracking number is: 770960938460

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Ken Kim
Sent: Friday, July 17, 2020 8:45 AM
To: Acacia Dietz <acacia.dietz@outlook.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Thanks for providing the telephone number – we will provide you with tracking information for the shipment as soon as it becomes available.

And thanks for confirming about the pending accounts for which iDS is not able to proceed further – we will note this on the status accordingly.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, July 17, 2020 4:07 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken ,
Here is the phone # to put with the devices: 863-838-6224

As for the emails that require 2FA Verification – the owners of all of the gmail accounts are unknown. Burt was unable to gain access to those accounts as well because of the need for the 2FA Verification and no idea who/what the phone numbers associated with those accounts belong to. So, unfortunately the former account holders are unknown and Burt does not know of any way to gain access to those accounts either. As for any of the accts that the password was “incorrect” Mr. Colucci stated that what he turned into iDS on the Certification form was the only passwords that he had for the associated accounts.

For the BlogTalk account (516)453-6058 – Mr. Colucci stated that he gave iDS the credentials for the account on his certification sheet.

Please let me know if there is anything else that is needed. Thank you

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Wednesday, July 15, 2020 9:17 AM
To: [Acacia Dietz](#); [Barbara Bibas](#)
Cc: [ESQ Edward ReBrook](#); [iDS SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

Please find attached spreadsheet with status of all the devices and accounts listed for NSM as provided in Mr. Colucci's certificate. As you can see, for most accounts iDS was either not provided with passwords or provided with incorrect passwords.

There are some accounts where the provided passwords did work but in order to proceed with the collections we would need to either coordinate bypassing 2 factor authentication or coordinate verification code to access compiled data for download (red highlighted accounts). Please coordinate with custodians of these accounts to set up a date/time with our forensics team to get these accounts addressed accordingly.

The handful of accounts highlighted in yellow are those accounts that iDS still has to address, i.e., try signing in with provided passwords.

Please let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions

Mobile: 267.847.4876



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From: Ken Kim
Sent: Wednesday, July 15, 2020 8:50 AM
To: Acacia Dietz <acacia.dietz@outlook.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

Thanks for providing, Acacia. We will ship the two devices to:

Burt Colucci
1238 HoneyTree Ln. E
Lakeland, FL 33801

Can you please provide a phone number to use for the shipment as well (as it is required by Fedex)?

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Wednesday, July 15, 2020 2:04 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

Please send Mr. Colucci's devices back to the return address that is on the packages. The address should be as follows:

1238 HoneyTree Ln. E, Lakeland, FL 33801

Thank you,

ACACIA DIETZ

Legal Assistant

THE REBROOK LAW OFFICE

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)

Sent: Tuesday, July 14, 2020 6:32 PM

To: [Acacia Dietz](#); [Barbara Bibas](#)

Cc: [ESQ Edward ReBrook](#); [IDS_SINKS-02678](#)

Subject: RE: Re: Sines v. Kessler

Hi Acacia:

We have completed imaging Mr. Colucci's laptop and iPhone. Please provide return shipping information for the two devices so we can get these returned as soon as possible.

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Ken Kim

Sent: Friday, July 10, 2020 8:57 AM

To: Acacia Dietz <acacia.dietz@outlook.com>; Barbara Bibas <bbibas@idsinc.com>

Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; IDS_SINKS-02678 <ids_sinks-02678@idsinc.com>

Subject: RE: Re: Sines v. Kessler

Hi Acacia:

No worries at all, and thanks for the information.

- 1) We will note this for the iPhone XS Max in the status report

- 2) Confirmed that we will collect Mr. Colucci's personal Twitter account and add this account to the status report – we will reach out to you if we have any issues with collection of this Twitter account.
- 3) We will have a better idea on timing of completion of the collections early next week – will update you then.
- 4) All documents produced will be in Relativity for your review.

Let us know if you have any questions.

Regards,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Acacia Dietz <acacia.dietz@outlook.com>
Sent: Friday, July 10, 2020 3:14 AM
To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

[EXTERNAL SENDER]

Ken –

I apologize for the delayed response as I was waiting on communication from Mr. Colucci regarding your concerns/questions.

The iPhone XS Max that belonged to Mr. Colucci is no longer in his possession. That phone had been returned to the Sprint dealer a few weeks prior to the court order when Mr. Colucci had upgraded to the iPhone which you received. Sorry about the confusion – it should have been noted on the certificate.

The personal Twitter account to which Mr. Colucci is referring to can be accessed directly from the iPhone which he sent to you. He did not have the credentials for it b/c the phone was already packaged to send and he was unable to access the Twitter account. Mr. Colucci gave his permission for iDS to access his Twitter account via the Twitter App on the iPhone. You are authorized to collect Mr. Colucci's Twitter account information.

If there are any questions regarding this please let me know by email or give me a call (586)696-0385 and I can assist you with this.

Also, do you know when the collection of Mr. Colucci's data will be done and he will be able to access his other accounts again? He inquired about when iDS would be done collecting ESI from the accounts / devices and when he would be able to gain access back etc.

I realize that all information collected will be made available to the Plaintiffs w/o review from us first according to the court order, however, will the collected information still be available in Relativity for us to view?

Thank you,

ACACIA DIETZ
Legal Assistant
THE REBROOK LAW OFFICE
Phone: 586.696.0385
Email: acacia.dietz@outlook.com

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From: [Ken Kim](#)
Sent: Thursday, July 9, 2020 10:36 AM
To: [Barbara Bibas](#); [Acacia Dietz](#)
Cc: [ESQ Edward ReBrook](#); [iDS SINKS-02678](#)
Subject: RE: Re: Sines v. Kessler

Hi Acacia:

We are in receipt of 2 devices shipped to us by Mr. Colucci, however, his certificate which we also recently received lists 3 devices – we have not received his iPhone XS Max.

Additionally, we wanted to raise with Mr. Colucci question about his personal Twitter account which he did not list on this certificate but provided a note about on the bottom of the certificate as follows:

5. Regarding my personal Twitter account, I do have access to it via my saved credentials on my cell phone, but I cannot produce login credentials any other way. The account has had little to no activity since it is creation date years ago. The recovery email is an old AOL account that I no longer have access to.

Should we try to collect Mr. Colucci's personal Twitter even though it is not listed in the certificate? And if so, we wanted to connect with Mr. Colucci to figure out a way to access the account.

Please advise.

Thanks,
Ken

Kenneth Kim
Consultant, Discovery Services
iDiscovery Solutions
Mobile: 267.847.4876



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https://www.chambersandpartners.com/12788/2817/editorial/58/1#22770855_editorial

From: Barbara Bibas <bbibas@idsinc.com>
Sent: Thursday, July 2, 2020 2:41 PM
To: Acacia Dietz <acacia.dietz@outlook.com>
Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>; iDS_SINKS-02678 <ids_sinks-02678@idsinc.com>
Subject: RE: Re: Sines v. Kessler

Hi Acacia,

We can see the device is on its way. We'll update you upon receipt.



Thank you,
Barbara

Barbara Bibas

Discovery Services Consultant

iDiscovery Solutions

535 Anton Blvd., Suite 860

Costa Mesa, CA 92626

Mobile: 949.929.1518

From: Acacia Dietz <acacia.dietz@outlook.com>

Sent: Thursday, July 2, 2020 11:32 AM

To: Ken Kim <kkim@idsinc.com>; Barbara Bibas <bbibas@idsinc.com>

Cc: ESQ Edward ReBrook <rebrooklaw@gmail.com>

Subject: Fwd: Re: Sines v. Kessler

[EXTERNAL SENDER]

Please see below about the tracking information regarding Burt Colucci's devices. Please let us know when they have been received. Thank you.

Acacia Dietz

The ReBrook Law Office

Phone: 586.696.0385

Email: acacia.dietz@outlook.com

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From: CommanderBurt <CommanderBurt@nsm88.org>

Sent: Wednesday, July 1, 2020 8:56:27 PM

To: acacia.dietz@outlook.com <acacia.dietz@outlook.com>

Subject: Fw: Re: Sines v. Kessler

----- Original Message -----

On Wednesday, July 1, 2020 5:07 PM, CommanderBurt <CommanderBurt@nsm88.org> wrote:

Mr. Barkai,

My electronic devices have been shipped via USPS Certified Mail. The tracking number is 7019 1640 0000 7603 9092

----- Original Message -----

On Wednesday, June 24, 2020 5:24 PM, Yotam Barkai <ybarkai@bsflp.com> wrote:

Mr. ReBrook and Mr. Colucci:

Pursuant to the Court's Order dated June 23, 2020, ECF No. 774, please find attached a blank Certification Form.

Yotam Barkai

Associate

OIES SCHILLER FLEXNER LLP

55 Hudson Yards

New York, NY 10001

(t) +1 212 303 3643

ybarkai@bsflp.com

www.bsfilp.com

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